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6 Attorneys for Defendant
CRISTIAN GUADALUPE ORTIZ CORONADO
7

8 IN THE UNITED STATES DISTRICT COURT
9 FOR THE EASTERN DISTRICT OF CALIFORNIA
10

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 vs.

14 CRISTIAN GUADALUPE ORTIZ
CORONADO,

15 Defendant.
16

Case No. 1:23-cr-00215-JLT-SKO

**STIPULATION TO CONTINUE STATUS
CONFERENCE; ORDER**

Date: July 31, 2024

Time: 1:00 p.m.

Judge: Hon. Sheila K. Oberto

17 IT IS HEREBY STIPULATED by and between the parties through their respective
18 counsel, Assistant United States Attorney Stephanie Stokman, counsel for plaintiff, and Assistant
19 Federal Defender Erin Snider, counsel for Cristian Guadalupe Ortiz Coronado, that the Court
20 may continue the status conference currently scheduled for June 5, 2024, at 1:00 p.m. to July 31,
21 2024, at 1:00 p.m. before the Honorable Sheila K. Oberto.

22 The parties agree and request the Court find the following:

23 1. On May 23, 2024, this Court entered a Minute Order directing the parties to meet
24 and confer regarding a mutually convenient date for trial to be discussed at the June 5, 2024
25 status conference.

26 2. The parties are not prepared to set a trial in this case for the following reasons:

27 a. Counts 1 and 2 of the Indictment—charging kidnapping in violation of 18
28 U.S.C. § 1201(a)(1) and hostage taking in violation of 18 U.S.C. § 1203(a), respectively—are

1 serious offenses. Count 1 carries a twenty-year mandatory minimum and a maximum term of life
2 imprisonment. Count 2 likewise carries a maximum term of life imprisonment.

3 b. The defendant was arrested on November 2, 2023, and undersigned
4 defense counsel was assigned the case on November 13, 2023—less than seven months ago.

5 c. The case involves substantial discovery. Although there are only 261-
6 Bates-marked items, the discovery includes data from nine phones. Additionally, because all
7 witnesses and the defendant are Spanish speaking, much of the discovery requires time-
8 consuming translation.

9 d. The government has not yet extended any plea offer to the defendant.

10 3. Counsel for the defendant requires additional time to review discovery, consult
11 with her client regarding the case, conduct necessary investigation, and engage in plea
12 negotiations.

13 4. Defense counsel believes that failure to grant the above-requested continuance
14 would deny her the reasonable time necessary for effective preparation, taking into account the
15 exercise of due diligence.

16 5. The government joins in the request for the continuance.

17 6. Based on the above-stated findings, the ends of justice served by continuing the
18 case as requested outweigh the interest of the public and the defendant in a trial within the
19 original date prescribed by the Speedy Trial Act.

20 7. For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,
21 *et seq.*, within which trial must commence, the time period of June 5, 2024, to July 31, 2024,
22 inclusive, is excludable pursuant to 18 U.S. C. § 3161(h)(7)(A) and (B)(iv).

23 **IT IS SO STIPULATED.**

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Respectfully submitted,

PHILLIP A. TALBERT
United States Attorney

Date: May 29, 2024

/s/ Stephanie Stokman
STEPHANIE STOKMAN
Assistant United States Attorney
Attorney for Plaintiff

HEATHER E. WILLIAMS
Federal Defender

Date: May 29, 2024

/s/ Erin Snider
ERIN SNIDER
Assistant Federal Defender
Attorney for Defendant
CRISTIAN GUADALUPE ORTIZ CORONADO

ORDER

IT IS SO ORDERED. The status currently scheduled for June 5, 2024, at 1:00 p.m. is hereby continued to July 31, 2024, at 1:00 p.m. For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161, *et seq.*, within which trial must commence, the time period of June 5, 2024, to July 31, 2024, inclusive, is excluded pursuant to 18 U.S.C. § 3161(h)(7)(A) and (B)(iv).

Dated: 5/31/2024

Sheila K. Oberto
Hon. Sheila K. Oberto
United States Magistrate Judge